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IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

JACK MARRONE, husband, KAREN  
MARRONE, wife, both individually and  
in their capacity as parents and guardians  
for VIDA MARRONE, a minor, and  
MATTHEW ADAM MARRONE,

Plaintiffs

vs.

ALLSTATE INSURANCE COMPANY,  
LINDA M. EDLEMAN, FRED SCHAFER,  
MT. GRETNAL REALTY, and HOUSE  
MASTERS

Civil Action No.: 1:CV-01-0718

FILED  
HARRISBURG, PA  
NOV 01 2002  
MARY E. D'ANGELO  
CLERK

(U.S. District Judge Yvette Kane)

JURY TRIAL DEMANDED

**MOTION FOR EXTENSION OF TIME IN WHICH TO FILE RESPONSES TO  
DEFENDANTS' MOTIONS FOR SUMMARY JUDGMENT**

AND Now come the Plaintiffs, by and through their counsel of record, Tarasi, Tarasi & Fishman, P.C., Louis M. Tarasi, Jr., Esquire, and Gianni Floro, Esquire, and hereby file this Motion for Extension of Time in which to File Responses to Defendants' Motions for Summary Judgement, and in support thereof says the following:

1. On October 18, 2002, the Defendants, Allstate Insurance Company (hereinafter, "Allstate"), Linda M. Edleman (hereinafter, "Edleman"), Fred Schaeffer and Mt. Gretna Reality (hereinafter, "Schaeffer/Mt. Gretna") and Housemaster all filed motions for summary judgment.
2. The Plaintiffs' responses to those motions for summary judgment are due on November 4, 2002. Fifteen (15) days after service of Defendants' motions falls on a Saturday, carrying the filing date over to Monday. F.R.C.P. 6(a).
3. The Plaintiffs respectfully seek leave of Court to allow the Plaintiffs to file their

responses to the Defendants' motions for summary judgment within thirty (30) days of November 4, 2002, *i.e.*, December 4, 2002.

4. Counsel for the Defendant, Edleman does not concur in the presentment of this motion for an extension of time, and counsel for the remaining Defendants did not oppose a twenty (20) day extension if all Defendants concurred. All Defendants but counsel for Edleman concurred in a twenty (20) day extension. (L.R. 7.1)

5. The undersigned, was married on October 19, 2002 and was away on his honeymoon from October 21, 2002 to October 30, 2002. Counsel for the Plaintiffs did not receive said motions until October 22, 2002 and October 25, 2002.

6. The Plaintiffs therefore request that an Order be entered permitting them to file their responses to the Defendants' motions for summary judgment by December 4, 2002.

Wherefore, the Plaintiffs respectfully request that this District Court enter an Order permitting them to file their responses to the Defendants' motions for summary judgment by December 4, 2002.

Respectfully submitted,

TARASI, TARASI & FISHMAN, P.C.

By: \_\_\_\_\_

Gianni Floro, Esquire

PA I.D. No. 85837

Attorney for the Plaintiffs

510 Third Avenue

Pittsburgh, PA 15219

P: (412) 391-7135

F: (412) 471-2673

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing **MOTION FOR  
EXTENSION OF TIME IN WHICH TO FILE RESPONSES TO DEFENDANTS'  
MOTIONS FOR SUMMARY JUDGMENT** was served on counsel for the Defendants on this  
31st day of October, 2002, by the United States Mail, First Class, Postage prepaid addressed as  
follows:

James G. Nealon, III, Esquire  
Nealon & Grover, P.C.  
2411 North Front Street  
Harrisburg, PA 17110

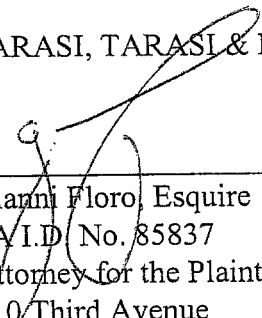
John Flounlacker, Esquire  
Thomas, Thomas & Hafer, LLP  
305 North Front Street  
Harrisburg, PA 17108

Edward A. Monsky, Esquire  
Fine, Wyatt & Carey, P.C.  
425 Spruce Street  
Scranton, PA 18501-0590

Jennifer L. Murphy, Esquire  
Duane, Morris & Heckscher, LLP  
305 North Front Street, 5th Floor  
Harrisburg, PA 17108-1003

TARASI, TARASI & FISHMAN, P.C.

Date: 10-31-02

By:   
Gianni Floro, Esquire  
PA I.D. No. 85837  
Attorney for the Plaintiffs  
510 Third Avenue  
Pittsburgh, PA 15219  
P: (412) 391-7135  
F: (412) 471-2673